

**United States Environmental Protection Agency
Region IX
POLLUTION REPORT**

Date: Thursday, December 11, 2008

From: Jason Musante

<p>To: Daniel Meer, US EPA R9 Peter Guria, US EPA R9 Ivania Brown, US EPA John Jaros, US EPA Steve Calanog, US EPA Steven John, US EPA George Baker, Cal EPA Dave Rasmussen, Cal EPA Gilberto Irizaray, US EPA Mary Simms, US EPA oepcsfn aol, na Roger Carrick, Carrick Law Group</p>	<p>Eugene Rainwater, US EPA Sherry Fielding, US EPA Barbara Lee, US EPA Jim Hanson, US EPA Celeste Temple, US EPA Chris Reiner, US EPA Andrew Helmlinger, US EPA David Gondek, City of El Monte trevor anderson, CA OES Ian Zelo, NOAA Paul Casagrande, US EPA</p>
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Subject: Initiation of Action
Crown City Plating Company
4350 Temple City Blvd., El Monte, CA
Latitude: 34.0861000
Longitude: -118.0553000

POLREP No.:	1	Site #:	09RR
Reporting Period:	12/08/08 - 12/10/08	D.O. #:	022-9035
Start Date:	12/9/2009	Response Authority:	CERCLA
Mob Date:	12/8/2008	Response Type:	Time-Critical
Demob Date:		NPL Status:	Non NPL
Completion Date:		Incident Category:	Removal Action
CERCLIS ID #:	CAD0083050602	Contract #	EP-W-07-022
RCRIS ID #:			

Site Description

The Site is located at 4350 Temple City Boulevard, in El Monte, Los Angeles County, California (91371). The Los Angeles County Assessor's Identification Number for the Site is 8577-001-028. The coordinates for the Site are 34° 05' 09.76" North latitude and 118° 03' 18.66" West longitude. The properties adjoining the Site are primarily light industrial in use, and the general area is a mix of light industrial and residential development. The Site is approximately 8.5 acres in size and is paved. Primary access to the Site is through gates along Temple City Boulevard.

The privately-owned Crown City Plating Company (CCPC) reportedly operated at the Site between 1955 and 2004. The company became one of the largest metal finishers in the United States, specializing in brass, chromium, copper, and nickel plating as well as plastics plating and organic finishing for the automotive, electronics, plumbing, and hardware industries. Some gold and silver plating also took place. On-Site treatment of some process-related solutions occurred at the facility wastewater treatment area (WWTA). The WWTA consisted of a ground-level treatment area as well as a below-grade treatment room (basement); both areas contain storage tanks, process

vessels, and other treatment process equipment.

The CCPC facility ceased operations in late 2004 and sought bankruptcy protection. Beginning late 2004 and reportedly extending into 2007, CCPC conducted closure activities at the Site, including the disposal or removal of all plating solutions and all equipment in the plating, polishing, painting, molding, and maintenance buildings. However, funding for closure activities was exhausted before the removal of all hazardous substances and wastes was complete or facility cleaning could occur.

On June 11, 2008, OSCs J. Musante and R. Wise met with El Monte Senior Deputy City Attorney David Gondek to discuss the Site. Mr. Gondek stated that, since being abandoned, the Site had become a public nuisance with a high volume of trespass leading to graffiti, vandalism, and theft of metals. Apparently, the Site had attained notoriety amongst graffiti “artists” who organized events at the Site and posted pictures advertising their activities on the internet. A number of small fires had been started at the Site by trespassers, requiring police and fire department response. On May 19, 2008, Mr. Gondek conducted an inspection of the facility with police department personnel and observed potentially hazardous wastes at the Site, which led to his contacting EPA.

Following the discussion, OSCs Musante and Wise conducted an inspection of the Site with Mr. Gondek. Also present were personnel from the El Monte Police Department, Los Angeles County Fire Department (LACFD), and the California Department of Toxic Substances Control (DTSC). The inspection consisted of a walk-through of the Site, noting general types and conditions of any containers or process areas that contained or potentially contained solid or liquid wastes. Container types present included drums, cylinders, vats, tanks, supersacks, sumps, and metal or concrete spill containment systems. Many containers held original product material or waste and were open to the environment. Several large buildings were empty, having been cleaned of process equipment during the facility closure. Other buildings or areas, such as the WWTa, showed signs of spilled or residual process-related waste on the floor, and several subsurface sumps around the Site were noted to be full of stagnant water. The contents of one above-ground storage tank (a 3,000-gallon tank labeled “sulfuric acid”) were observed to have been released into the secondary containment basin.

OSC Wise contacted PRP Mr. Rankin and made arrangements to meet at the Site. On June 16, 2008, OSCs Wise and Musante and EPA Civil Investigator J. Jaros conducted a walk-through of the Site with Mr. Rankin and a former CCPC employee who was involved with the facility closure activities. Mr. Rankin represented that many containers present at the Site contained hazardous wastes and that disposal of these wastes was not completed due to lack of resources. Additionally, Mr. Rankin stated that limited closure activities had been conducted in the WWTa and the system was basically left in place as it was when the facility was in operation. Site conditions prompted OSC Wise to give a general notice of CERCLA liability to Mr. Rankin. Mr. Rankin represented that CCPC was in bankruptcy and did not have the resources to secure the Site or conduct any removal work associated with potentially hazardous wastes at the Site. This lack of immediate response capability by the apparent liable party, coupled with hazardous wastes in unsecured areas accessible to the public, resulted in OSC Wise initiating an emergency action to secure the Site. Emergency activities within the OSC’s authority commenced on June 16, 2008, when OSC Wise made arrangements for the EPA Emergency and Rapid Response Services (ERRS) contractor to provide 24-hour security at the Site to prevent trespassers from entering the Site and being exposed to the hazardous wastes present.

On June 24, 2008, OSCs Musante and Wise conducted further Site reconnaissance, generally walking through the facility and noting the general types and conditions of any containers or process areas that contained or potentially contained solid or liquid wastes. Additionally, sampling locations and required analyses were identified by the OSCs. The EPA technical response contractor (START) completed a container inventory during the reconnaissance, which included

marking an inventory number on each container. The START Container Inventory and Sample Summary listing: inventory ID number, lab sample ID, container/contents description, location, and analysis requested.

On June 26, 2008, the START implemented an approved Emergency Response Quality Assurance Sampling Plan at the Site. Field chemistry verified the presence of corrosive solutions in unsecured and compromised bulk containers. Twenty-six samples were collected from sumps, drums, process tanks or vessels, above-ground storage tanks, supersacks, and pipe insulation. Field testing and laboratory analytical data confirmed the presence of corrosive solutions, asbestos containing materials, high concentration cyanide residues, and numerous heavy metal contaminated waste streams associated with former electroplating and industrial wastewater treatment processes.

Current Activities

12/08/08 Mobilization Day

Personnel on-site: OSC Musante; ERRS RM and FM; START-2.

ERRS took delivery of equipment and supplies. OSC Musante, ERRS, and START performed a walk-through of the site to identify wastes for removal and discuss removal strategy.

12/09/08

Personnel on-site: OSC Musante; ERRS 8: RM, FM, T&D, FCA, 4-CT; START-2.

ERRS:

- Consolidated contents of Anodizing Area drums Inventory ID #61-82 into roll-off bin (ROB) #IE304. Empty drums treated with bleach and placed into RCRA debris bin #IE302.
- Consolidated contents of Shipping/Receiving Area containers #14-24 into ROBs #IE278 and #IE157. Empty containers placed into RCRA debris bin #IE302.
- Consolidated contents of Area under roof ramp drums Inventory ID #27-48 into ROB #IES246. Empty drums and placed into RCRA debris bin #IE302.

START: Documentation of removal activities, container consolidation tracking, and preparation of consolidated site-specific HASP.

12/10/08

Personnel on-site: OSC Musante, OSC Benson; ERRS 8: RM, FM, T&D, FCA, 4-CT; START-2.

ERRS:

- Consolidated contents of Anodizing Area drums Inventory ID #50-60 into roll-off bin (ROB) #IE304. Empty drums placed into RCRA debris bin #IE302.
- Cut hole in Lime Silo Inventory ID #90 in preparation for removal with "Supersucker".
- Completed "drum round-up" of empty and miscellaneous containers in facility. Additional containers were found in newly discovered basement under the Shipping/Receiving area.
- Performed compatibility test and consolidated corrosive material in drum #99 into drum #100.

START:

- Documentation of removal activities and container consolidation tracking.
- Hazcatting of contents of drums Inventory ID #1-8, 11-14.

Planned Removal Actions

Here is list of the specific items to be addressed during this removal action, based upon the START assessment data:

- Maintenance Area: approx. 12 drums of oil; Inventory ID #1-8, 11-14.
- Shipping and Receiving Area: 1 drum and 10 supersacks of metals/cyanide waste; Inventory ID #14-24, sample ID CCP-15 and -16 respectively.
- Area under roof ramp: 22 drums of metals waste; Inventory ID #27-48, sample ID CCP-14.
- Anodizing Area: 22 drums of metals/cyanide waste; Inventory ID #61-82, sample ID CCP-18.
- Boiler Room: asbestos pipe insulation; sample CCP-25.
- Sump outside of Anodizing Area: water w/chromium/cyanide and sediment with metals/cyanide; Inventory ID #S-3, sample ID CCP-21 and -26 respectively.
- Drum outside of Anodizing Area: metals/cyanide waste; Inventory ID #83, sample ID CCP-19.
- WWTA Basement:
"Chrome Settling Tank" chromium/lead, Inventory ID #98, sample ID CCP-20; 2 drums pH <2 and chromium, Inventory ID #99 and 100, sample ID CCP-2 and -3 respectively.
- WWTA:
"Clarifier #2" metals, Inventory ID #88, sample ID CCP-5;
"Sand Filter" metals, Inventory ID #87, sample ID CCP-7 and -13;
"Sulfuric Acid" tank pH <1, Inventory ID #96, sample ID CCP-8;
Lime Silo pH 13, Inventory ID #90, sample ID CCP-9;
Lime Silo sump pH 12, Inventory ID #90, sample ID CCP-23;
"Sodium Hydroxide" tank pH 14, Inventory ID #94, sample ID CCP-10.

Next Steps

- Boiler Room: Collection of asbestos pipe insulation.
- Sump #3 outside of Anodizing Area: removal of water and sediment.
- Drum #83 outside of Anodizing Area: place in salvage drum for disposal.
- Removal of contents of Inventory ID #98 "Chrome Settling Tank" in WWTA Basement.
- Removal of contents of Inventory ID #88 "Clarifier #2" in WWTA.
- Removal of contents of Inventory ID #87 "Sand Filter" in WWTA.
- Removal of contents of Inventory ID #96 "Sulfuric Acid" tank in WWTA.
- Removal of contents of Inventory ID #90 Lime Silo in WWTA.
- Removal of contents of Inventory ID #90 Lime Silo sump in WWTA.
- Removal of contents of Inventory ID #94 "Sodium Hydroxide" tank in WWTA.

Key Issues

The scope of this removal action is limited to hazardous wastes identified that represent a direct or indirect contact hazard. The building structure and subsurface likely contain materials contaminated from operations at the facility. A complete assessment and potential remediation is needed before any reuse of the facility. EPA will provide the City of El Monte and the Debtor-in-Possession, Continental Business Credit, with a copy of the START Removal Report for consideration in future options for the facility.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$545,000.00	\$340,000.00	\$205,000.00	37.61%

RST/START	\$50,000.00	\$5,000.00	\$45,000.00	90.00%
Intramural Costs				
USEPA - Direct (Region, HQ)	\$20,000.00	\$5,000.00	\$15,000.00	75.00%
USEPA - InDirect	\$283,109.00	\$0.00	\$283,109.00	100.00%
Total Site Costs	\$898,109.00	\$350,000.00	\$548,109.00	61.03%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

response.epa.gov/CrownCityPlating